

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF NEW YORK

ROY DEN HOLLANDER,

Plaintiff,

Civil Action No. 08-cv-4045(FB)(ECF)

v.

DEBORAH SWINDELLS DONOVAN,
PAUL W. STEINBERG, and
JANE DOE,

Defendants.

SUPPLEMENTAL COMPLAINT FOR COPYRIGHT INFRINGEMENT

In this Supplemental Complaint filed under Fed. R. Civ. P. 15(d), the plaintiff alleges damages and alternative relief as follows:

Damages

1. The defendants, without authorization, placed the essays on the PACER website and in court files available to the general public after the plaintiff became a public figure.
2. When the author became a public figure in August 2007, the essays' values increased over their original worth when temporarily displayed before he was a public figure
3. The defendants, however, by making the essays permanently available to the author's potential markets, including derivative, licensing, and those the plaintiff could reasonably develop, have substantially reduced their value.

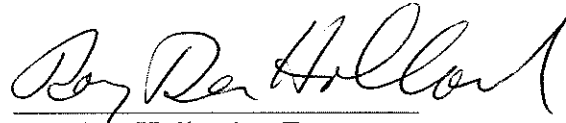
Alternative Relief Sought

4. A proportion of the profits attributable to defendants Swindells-Donovan and Steinberg's infringement of the six essays as provided for under 17 U.S.C. § 504(b) is requested.

5. Both defendants Swindells-Donovan and Steinberg used the copyrighted essays in litigation for which, on information and belief, they made a monetary profit.

6. The amount by which the defendants profited from their unauthorized use of the essays is peculiarly within their knowledge, and, therefore, the plaintiff is unable to plead the actual amount.

Dated: April 1, 2009
New York, N.Y.

A handwritten signature in black ink, appearing to read "Roy Den Hollander", written over a horizontal line.

Roy Den Hollander, Esq.
Attorney and plaintiff
545 East 14 Street, 10D
New York, N.Y. 10009
(917) 687-0652